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Of Attorneys for Plaintiff

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

TED TIMMONS,			Case No. 3:22-cv-1235-SB
Plaintiff,			
v.			MOTION FOR EXTENSION OF TIME
CITY OF PORTLAND, ASKELSON,	and ]	BRYCE	
Defendants.			

## L.R. 7-1 CERTIFICATION

By and through their respective counsel, the parties have conferred regarding this motion and Defendants do not object.

## **MOTION**

The current deadline for Plaintiff's Response to Defendants' Motion to Strike (Dkt. 10) is November 30, 2020. Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff moves the Court for an order extending the Response deadline by 1 week (7 days) to December

7, 2022.

Defendants' Motion was filed prior to the long Thanksgiving holiday, and additionally

Plaintiff's Counsel is preparing for a trial before Judge Hernández set to begin December 1,

2022.

Plaintiff anticipates that 7 days should be sufficient to prepare an adequate response to

the Defendants' Motion.

This motion is based on the attached Declaration of Juan C. Chavez, filed herewith.

**DATED** November 30, 2022

/s/ Juan C. Chavez

Juan C. Chavez, OSB #136428

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